

Exhibit E

From: Wolin, Michael (ATR) <Michael.Wolin@usdoj.gov>
Sent: Monday, May 5, 2025 4:53 PM
To: Craig.Reilly@ccreillylaw.com; Dunn, Karen L; Rhee, Jeannie S; Isaacson, William A; Phillips, Jessica E; Eric Mahr; Andrew Ewalt; Spevack, Erica
Cc: Wood, Julia (ATR); Huppert, Matthew (ATR); Teslicko, David (ATR); Briskin, Craig (ATR); Petterson, Linnaea (ATR); Tyler T. Henry; Lauren Pomeroy; Feder, Morgan; Elliott.Dionisio@doj.ca.gov; Wolin, Michael (ATR)
Subject: United States et al. v. Google LLC (Ad Tech) - Meet-and-Confer re Remedies Documents

Dear Counsel,

During the liability phase, Google withheld from production certain documents related to Google's own analyses of potential divestitures of portions of its ad tech businesses—in particular, the documents related to Google's Project Sunday and Project Monday. Plaintiffs' first set of document requests, served this past Friday, specifically request these documents.

Even assuming these documents qualify as work product, they are at most factual work product which is discoverable upon a showing of substantial need. Given that Google has represented to the Court that it will offer evidence on "infeasibility of technical divestiture" (5/2/2025 Hearing Tr. at 18:21-23), Plaintiffs believe substantial need exists for production of these highly relevant materials, as well as any other documents that relate to Google's claim that Plaintiffs' proposed remedies would be logistically difficult and/or technologically infeasible.

If Google plans to maintain its position that documents (and associated testimony) on these analyses are shielded from disclosure, we intend to raise this matter with the Court by filing a motion this coming Friday. We need to move expeditiously, given the short period for discovery. Please provide times tomorrow or on Wednesday when counsel for Google is available to meet and confer on this issue.

Regards,
Michael Wolin

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